

EXHIBIT B

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BEGASHAW AYELE,

Plaintiff,

V.

COGNISA SECURITY COMPANY, INC.,

Defendant.

Civil Action No.: 04CV12217-PBS

DEFENDANT COGNISA SECURITY, INC.'S
FIRST SET OF INTERROGATORIES TO PLAINTIFF

COMES NOW Defendant Cognisa Security, Inc. (incorrectly identified in Plaintiff's Complaint as "Cognisa Security Company, Inc." hereinafter "Defendant" or "Cognisa") and requests that Plaintiff Begashaw Ayele (hereinafter "Plaintiff") answer these Interrogatories, under oath, in accordance with Rule 33 of the Federal Rules of Civil Procedure.

INSTRUCTIONS FOR ANSWERING

1. Please note that all answers are to be made separately and fully and that an incomplete or evasive answer is a failure to answer. Where an Interrogatory calls for an answer in more than one part, please separate the parts in your answer accordingly so that each part is clearly set out and understandable.
2. Where knowledge or information in your possession is requested, such request includes knowledge or information in possession of your representatives, agents, insurers, and, unless privileged, your attorneys.
3. If you have only incomplete knowledge of the answer to an Interrogatory, please answer to the extent of your knowledge and state specifically what part or area of the

Interrogatory you have only incomplete knowledge of and identify the person(s) who does or might have additional knowledge or information to complete the answer.

4. You may answer any Interrogatory in whole or in part by attaching a document(s) which contains information sufficient to do so. Such document(s) may, if authenticated, be a copy of the original. Any document(s) used to answer an Interrogatory may contain other information as well; however, the relevant portion of that document(s) must be so marked or indexed. If you once had possession of any document identified in your response to any Interrogatory, but said document was destroyed, lost, given, or loaned to another, or is otherwise unavailable for inspection, please furnish Cognisa with: (a) the name and address of all other persons who have or may have said document; (b) a summary of the contents of said document; and (c) the date and reason why said document was destroyed, lost, given, loaned or otherwise became unavailable.

5. The term "document(s)" refers to all writings of any kind, including the originals and all non-identical copies, whether different from the original by reason of any notation made on such copies or otherwise, including without limitation, correspondence; memoranda; notes; diaries; statistics; letters; materials; orders; directives; interviews; telegrams; minutes; reports; studies; statements; transcripts; summaries; pamphlets; books; inter-office and intra-office communications; notations of any sort of conversations, telephone calls, meetings or other communications; bulletins; printed matter; teletype; telefax; e-mail; worksheets; and all drafts, alterations, modifications, changes and amendments of any of the foregoing; graphic or oral recordings or representations of any kind, including without limitation, photographs, charts, graphs, microfiche, microfilm, videotapes, records, motion pictures; and electronic, mechanical,

or electrical recordings or representatives of any kind, including without limitation, tapes, cassettes, cartridges, disks, chips, and records.

6. Where the identity of a person is requested, please state his or her full name; any known nickname and aliases; present or last known home address and telephone number; present or last known position and business affiliation or employment and the address and telephone number there; and his or her employment and position at the time in question. For persons whose addresses are known to be inaccurate at this time, please state the most reliable contact address and contact person to your knowledge or information.

7. Where a statement or description is requested, please include a specific account of what is being stated or described, including, where applicable, without limitation, the date or time period involved; the identity of the person(s) from whom the information was learned, who would have knowledge of that information and/or who participated or was present; what happened in chronological order relating each identifiable event, response act, or other occurrence; where, by address and, if known, ownership and use, the occurrence took place; the context or circumstances in which the occurrence took place; and what response or reaction existed to cause the occurrence to take place and/or was made after the occurrence took place.

8. Unless otherwise indicated, the time period each Interrogatory refers to is that of the occurrences described or referred to in the Complaint, the Amended Complaint and any further amendments thereto.

9. Please note that, pursuant to the Federal Rules of Civil Procedure, you are under a continuing duty to supplement your responses.

INTERROGATORIES

1.

Identify all persons you have interviewed and/or obtained any statements from concerning the facts or claims contained in your Complaint or Amended Complaint and state whether the statements were written or oral.

2.

Identify all persons you believe have knowledge of any of the facts or claims contained in your Complaint, Amended Complaint, or the charge of discrimination you filed with the Equal Employment Opportunity Commission ("EEOC") or the Massachusetts Commission Against Discrimination ("MCAD").

3.

Identify any current or former employee of Defendant with whom you have discussed your claims or the conduct you allege gives rise to your claims.

4.

For each person identified in response to Interrogatory No. 2 above, state the basic facts or claims of which that person has knowledge.

5.

Identify all documents you plan to use in support of your claims at trial or which you contend support your claims at this time.

6.

Identify with specificity and particularity each and every element and item of damages (including monetary amounts) that you contend that you are entitled to recover from Defendant in this action.

7.

Explain in detail how each damages item identified in response to Interrogatory No. 6 was calculated, and further identify: (a) each and every document supporting each damages item; and (b) each and every person whom you contend has knowledge of each damages item.

8.

Identify all reports of each expert witness you intend to call to testify on your behalf concerning your claims or damages.

9.

State all income or other monies you have received since January 1, 2003, from whatever source, including unemployment compensation, and identify the sources of such income or monies.

10.

Identify any other employers with whom you applied for employment since January 1, 2003, including the dates of application, the individual(s) contacted, and any documents evidencing such application, the result of your application (e.g., if you were offered a job; if the employer is still holding your application; if you were denied the position you applied for; if you received no response, etc.) and the reason given to you for the result of your application.

11.

List all employers with whom you have been employed since January 1, 2003, including their addresses, telephone numbers, your immediate supervisor's name, the dates of your employment, and the reasons for leaving each employer.

12.

If you claim damages for alleged emotional distress or suffering, please identify any physician, psychiatrist, psychologist, therapist or counselor that you have consulted with or been treated by within the last ten (10) years.

13.

Identify any and all medical doctors, physical therapists, nurses, psychologists, psychiatrists, counselors, advisors and/or other medical or psychological professionals whom you have seen for all injuries you have allegedly suffered as a result of the alleged discrimination and/or retaliation in this case.

14.

Identify any individuals consulted in connection with the preparation of the answers to these Interrogatories.

15.

If you are represented by counsel, identify in detail your fee arrangement with your attorney(s) in this lawsuit (i.e., hourly, contingency fee, a combination of hourly and contingency, or some other basis). If your arrangement is on an hourly basis (in whole or in part), please identify the amount of any retainer that you have paid, the hourly fees of each and every lawyer and/or paralegal working on the case, the amount of all legal fees, costs, and/or expenses that you have paid to date, and an estimate of your legal fees, costs, and/or expenses through completion of trial. If your fee arrangement is on a contingency fee basis, please detail the specific arrangements (including all percentage of recovery fee arrangements).

16.

Identify all legal proceedings to which you have been a party within the last ten (10) years, including, but not limited to, any civil actions, criminal actions, divorce proceedings, bankruptcy proceedings, child custody proceedings or any administrative proceeding of any type. Please identify each matter by providing the names of all parties to the action, the court or administrative forum in which the matter is or was pending, the applicable case number, the date of such filing, the nature of the allegations underlying such filing, and the disposition of such filing.

17.

Have you applied for workers' compensation benefits, social security benefits, unemployment benefits, pension or retirement benefits, benefits from a profit sharing plan, health care benefits, disability benefits, benefits stemming from an insurance policy, or any other benefits from any local, state or federal agency or any other source? If so, please describe the specific information and details provided by you in these applications, and identify any and all documents within your possession, custody, or control which evidence these applications for benefits, including, but not limited to, any application forms or supporting documentation.

18.

State the basis for your claims that you were discriminated against on the basis of your race, color, national origin and alleged disability.

19.

Identify all legal proceedings to which you have been a party within the last ten (10) years, including, but not limited to, any civil actions, criminal actions, divorce proceedings, bankruptcy proceedings, child custody proceedings or any administrative proceeding of any type.

For each such proceeding, identify the court, case number and parties' names, and describe the claims brought, relief sought and the resolution and/or status of the case.

Respectfully submitted,

COGNISA SECURITY, INC.

By its attorneys



Bronwyn L. Roberts, BBO# 638079

DUANE MORRIS LLP

470 Atlantic Avenue, Suite 500

Boston, MA 02210

(617) 289-9200

and Co-Counsel
(admitted *pro hac vice*)
Terry P. Finnerty
Georgia Bar No. 261561
Peter B. Murphy
Georgia Bar No. 531032
Duane Morris LLP
1180 West Peachtree Street
Suite 700
Atlanta, GA 30309
(404) 253-6900

Dated: March 1, 2005

CERTIFICATE OF SERVICE

I hereby certify that on ^{March}~~January~~ 1, 2005, a true copy of the above document was served by first class mail upon Plaintiff addressed as follows:

Begashaw Ayele
261 O'Callaghan Way #816
South Boston, MA 02127



Bronwyn L. Roberts